

A Coalition of Concerned Citizens
202 E 7th Street
Moscow ID 83843

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Department of Water Resources

November 22, 2003

Mr. Karl Dreher, Director
Idaho Department of Water Resources
PO Box 83720
Boise ID 83720-0098

Via Facsimile: 208-327-7866

Dear Mr. Dreher:

Please accept this corrected copy of this document that was originally faxed as well as sent to your office via Federal Express on November 21, 2003.

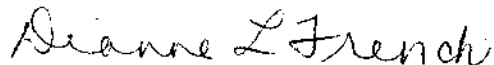
Attached is the correct version intended for submission. We ask that you please replace the letter dated November 20, 2003 with the date of November 21, 2003 in the header with this version also dated November 20, 2003, but with "Corrected Copy" and the date of November 22, 2003 in the header. Please destroy the former version, if possible, to avoid confusion.

This correct version is being faxed to you on November 22, 2003, and hard copy has been put in the regular mail.

The attachments delivered with the incorrect version of this letter via Federal Express are meant for attachment to this letter. Should you require additional copies of those documents, they can be provided at once. Additional supplemental documentation in support of this petition will be submitted to your office in the near future.

Thank you again for your time and attention to this important matter.

Sincerely,



Dianne French
Board of Directors
Palouse Water Conservation Network

On behalf of:

Palouse Water Conservation Network
Friends of the Clearwater
Moscow Civic Association
Palouse Group of the Sierra Club
Idaho Conservation League, North Idaho Office

11/22/03

A Coalition of Concerned Citizens
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Moscow ID 83843

November 20, 2003

Mr. Karl Dreher, Director
Idaho Department of Water Resources
PO Box 83720
Boise ID 83720-0098

Via Facsimile: 208-327-7866

Dear Mr. Dreher:

The undersigned coalition of Moscow civic and conservation groups submit this Petition for designation of a Critical Groundwater Area for the Grande Ronde Aquifer and designation of a Groundwater Management Area for the Wanapum and alluvial/shallow aquifers that are within or tributary to the Moscow groundwater subbasin. This request is based on the well-known and fully documented historic decline of water levels in the Grande Ronde Aquifer, the history and current status of water usage in the region, and the unsuccessful efforts to date to reverse the aquifer mining and return to sustainable pumping levels. Documentation in support of this petition will be submitted to your office in the near future.

We request that the Idaho Department of Water Resources take the following actions:

- (1) Pursuant to Idaho Code Sec. 42-233A, designate that portion of the Grande Ronde aquifer lying within the boundaries of the Moscow groundwater subbasin as a critical groundwater area.
- (2) Pursuant to Idaho Code Sec. 42-233B, designate those portions of the Wanapum aquifer and the shallow/alluvial aquifer lying within or tributary to the Moscow groundwater subbasin as a groundwater management area.
- (3) Impose a moratorium on the processing and approval of all pending and new applications for permits to appropriate water from the Grande Ronde, Wanapum and shallow/alluvial aquifers within or tributary to the Moscow groundwater subbasin, pending adoption and implementation of a plan to stabilize groundwater levels and provide for a sustainable water supply for area residents.
- (4) Impose a moratorium on further development of the inchoate portion of any existing water permit authorizing the withdrawal of water from the Grande Ronde aquifer.
- (5) Order all water right holders withdrawing from the Grande Ronde aquifer to reduce their withdrawals of water on a time priority basis, until a sustainable pumping rate is achieved.
- (6) Require all water right holders within the designated critical groundwater and groundwater management areas to meter and report their withdrawals of groundwater to IDWR.
- (7) Rescind participation in those portions of the April 1992 "Interagency Agreement" with the Washington Department of Ecology that are contrary to Idaho law, including approval of the Pullman-Moscow Groundwater Management Plan authorization of continuing non-sustainable pumping of the Grande Ronde aquifer.
- (8) Establish a groundwater management advisory committee and appoint persons to the committee in a manner that ensures full representation of the diverse interests in the Moscow area relating to water resources, including the Petitioners. Petitioners further request that such advisory committee be charged with the following tasks:
 - a. Development of a groundwater management plan that incorporates a binding implementation strategy to achieve the objective of maintaining sustainable groundwater pumping levels.
 - b. Development of a water conservation plan, including implementation strategies, that is binding on all IDWR water right holders who withdraw water in the Moscow groundwater subbasin.

- c. Development of requirements and conditions for any new water permits that will allow development of the resource only in the public interest and only while protecting existing water rights in accordance with Idaho law.
- d. Provide a forum for collecting and reviewing technical data and scientific information relating to the Moscow groundwater subbasin aquifers, including information relating to potential recharge of the aquifers.
- e. Develop and oversee a plan for public participation in the adoption of the groundwater management plan and other activities that relate to the use of the groundwater resources in the Moscow area.

Finally, we request that the Idaho Department of Water Resources schedule a public hearing to allow opportunity for full public review and comment on this Petition. Unfortunately, recent actions of the City of Moscow and the Palouse Basin Aquifer Committee to seek a lesser designation of the Grande Ronde Aquifer appear to be motivated, in part, to avoid citizen participation and lock in the status quo, rather than taking the necessary steps toward sustainable use of our aquifer system. We trust that IDWR will provide for full public review of the problems associated with our regional groundwater supply as well as full public participation in the development of appropriate solutions.

Local contacts for the undersigned coalition are:

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Friends of the Clearwater
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Moscow ID 83843
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kelley@moscow.com

Thank you for your attention to this important matter.

Sincerely,



Bill French
Palouse Water Conservation Network



Kelley Racicot
Friends of the Clearwater

Palouse Water Conservation Network, 202 E 7th Street, Moscow, Idaho 83843
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